

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

HON. ORELIA E. MERCHANT  
M. J. STEVEN L. TISCIONE

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AUTOEXPO ENT INC., PEACE PROPERTIES LLC,  
NETWORK REINSURANCE COMPANY INC., AUTO  
EXCHANGE CENTER, LLC, and CHROME  
INSURANCE AGENCY LLC,

Case No.: 2:23 cv 9249

*Plaintiffs*

*Against*

**NOTICE OF MOTION**

OMID ELYAHOU, SIMPSOCIAL LLC, FIFTY  
SEVEN CONSULTING CORP. d/b/a CERTIFIED  
AUTO GROUP a/k/a CERTIFIED PERFORMANCE  
MOTORS AVI EITAN, and FAZEEDA KASSIM,

*Defendants.*

-----X  
PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, dated the 13<sup>th</sup> day of May 2024, and upon all papers filed herein, a motion will be made by the Defendants to this Court, the HONORABLE ORELIA E. MERCHANT presiding, at the courthouse located at United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201, on the 24<sup>th</sup> day of June 2024 the date set by the Court on April 12, 2024 at 9:30 o'clock in the forenoon or as soon thereafter as counsel can be heard, for a judgment pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, dismissing the Complaint, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served within the time limits specified in the Order entered on April 12, 2024, whereby the Court provided that Defendants' papers are to be served on or before May 13, 2024; Plaintiffs' opposition papers are to be served on or before June 10, 2024; Defendants' reply, if any, and the entire bundled motion is to be filed on or before June 24, 2024. (*See* Dkt. No. 23).

Dated: May 13, 2024

Garden City, New York

Respectfully Submitted,  
EMOUNA & MIKHAIL, PC

*Matin Emouna*

MATIN EMOUNA, ESQ.  
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